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Attorneys for Plaintiffs Coach, Inc.

and Coach Services, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORLAND DIVISION

COACH, INC., a Maryland Corporation;

COACH SERVICES, INC., a Maryland

Corporation,

Plaintiffs,

v.

SISKIYOU BUCKLE CO., INC., an Oregon

Corporation dba **SISKIYOU GIFTS; DOES**

1-10, inclusive,

Defendants.

CASE NO: 3:11-cv-00486-HZ

**PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT RE
DEFENDANT'S LIABILITY FOR
TRADEMARK INFRINGEMENT**

LOCAL RULE 7-1 COMPLIANCE

Defendant is represented by attorney Donald A. Bick. Plaintiff Coach, Inc. ("Coach"), by and through its attorneys certifies that counsel has conferred by email and telephone with Mr.

Bick, and that the parties were unable to resolve this matter. The Court's involvement is necessary.

MOTION

Pursuant to FRCP 56, Plaintiffs Coach, Inc. and Coach Services, Inc. hereby move this Court for summary judgment on the issue of liability for trademark infringement (15 U.S.C. § 1114) against Defendant Siskiyou Buckle Co., Inc. on the ground that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law for the reason that (1) there is no dispute that the goods at issue were introduced into the stream of commerce by Defendant; and (2) the goods bear marks which are identical and/or confusingly similar to Coach's federally registered trademarks.

The Motion is based on the accompanying Points and Authorities, the Declarations of Dayanara Perez and Brent H. Blakely, and the files and records in this action, and any further evidence or argument that this Court may properly receive at or before the hearing.

DATED: February 6, 2012

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By: /s/ Christopher E. Hawk
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